

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

STAMBAUGH’S AIR SERVICE, INC.,	:	
	:	
Plaintiff	:	
v.	:	CASE NO. 1:CV-00-0660
	:	
SUSQUEHANNA AREA REGIONAL	:	Judge Yvette Kane
AIRPORT AUTHORITY, BAA	:	Magistrate Judge J. Andrew Smyser
HARRISBURG, INC., DAVID FLEET,	:	
individually, DAVID HOLDSWORTH,	:	
individually, and DAVID C. McINTOSH,	:	JURY TRIAL DEMANDED
individually,	:	
Defendants	:	
.....	:	

**JOINT MOTION TO STAY**  
**ALL PLEADING TIME REQUIREMENTS**  
**UNDER CASE MANAGEMENT ORDER AND SUBSEQUENT**  
**AMENDMENTS**

AND NOW, comes the Plaintiff, Stambaugh’s Air Service, Inc., by and through its counsel, Cunningham & Chernicoff, P.C. and Defendants SARAA and the various individual Defendants by and through their counsel, Rhoads & Sinon, who file this Joint Motion to Stay All Pleading Time Requirements Under the Case Management Order and Subsequent Amendments and, in support thereof, avers the following:

1. The parties have reached a tentative global settlement of all issues.
2. Plaintiff's counsel has received authorization from his client to settle upon the terms and conditions tentatively agreed upon.
3. Defendants' counsel has received authorization from each individual Defendant to settle upon the terms and conditions tentatively agreed upon.
4. Defendant, SARAA, has a formal public meeting scheduled for August 22, 2007 at which time the settlement of this matter is on its meeting agenda and will be voted upon.
5. Defendants' counsel has discussed the terms and conditions of the global settlement with the majority of the SARAA Board Members and expects approval of the proposed settlement by formal action of the Board on August 22, 2007.
6. Pursuant to this Court's Order of July 24, 2007, which Order amended the Case Management Order, Plaintiff is scheduled to file by July 31, 2007 the following: Plaintiff's Response and Brief in Opposition to Defendants' Motion for Summary Judgment; Plaintiff's Response to Defendants' Statement of Undisputed Material Facts; Plaintiff's Statement of Undisputed Material Facts; and Plaintiff's Response and Brief in Opposition to Defendants' Motion for Sanctions for Failure to Properly and Timely Disclose Documents Supporting Damages Claim.

7. In light of the tentative global settlement agreement, which agreement has been approved by all individual parties, and in light of the agreement being on SARAA's meeting agenda for August 22, 2007, the parties jointly request a stay of all pleading deadlines under the Case Management Order and all subsequent amendments thereto.

8. The parties' respective counsel will report to the Court status of the approval of the settlement by the SARAA Board on August 23, 2007.

WHEREFORE, the parties respectfully request this Honorable Court to enter an Order staying all pleading deadlines set forth in the Case Management Order and all subsequent amendments thereto until August 23, 2007.

Respectfully submitted,

CUNNINGHAM & CHERNICOFF, P.C. RHOADS & SINON

By: /s/ Jordan D. Cunningham, Esquire  
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*Attorneys for Defendants*

Dated: July 31, 2007

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individually, DAVID HOLDSWORTH,	:	
individually, and DAVID C. McINTOSH,	:	
individually,	:	JURY TRIAL DEMANDED
Defendants	:	
.. . . .	:	

**CERTIFICATE OF SERVICE**

I, Angela L. Hewitt, legal secretary with the law firm of Cunningham & Chernicoff, P.C., hereby certify that on the **31<sup>st</sup>** day of **July, 2007**, served a true and correct copy of the foregoing **Joint Motion to Stay All Pleading Time Requirements Under the Case Management Order and Subsequent Amendments** by electronic means or first-class U.S. Mail, postage prepaid, to:

Dean F. Piermattei, Esquire  
Rhoads & Sinon LLP  
One South Market Sq., 12<sup>th</sup> Flr.  
P.O. Box 1146  
Harrisburg, PA 17108-1146

\_\_\_\_\_  
/s/Angela L. Hewitt  
Angela L. Hewitt